

**United States Bankruptcy Court  
For the Southern District of Texas  
Corpus Christi Division**

In re:	§	Case No. 16-20039
Hurtado, Humberto	§	
Hurtado, Jessica Lupita	§	
	§	
Debtor(s)	§	Chapter 13

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**DEBTOR'S RESPONSE TO TRUSTEE'S MOTION TO DISMISS**

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**TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:**

NOW COMES, Debtor(s), in the above styled matter by and through attorney of record, and files this response to the *Trustee's Motion to Dismiss* and would show and request the following:

1. Debtor(s) hereby requests a Hearing on the Trustee's Motion to Dismiss.
2. That the Trustee's Motion to Dismiss be denied because Debtor(s) will file all necessary amendments to debtor(s) schedules, and/or Chapter 13 Plan prior to the dismissal hearing.

WHEREFORE ALL PREMISES, CONSIDERED, Debtor(s) respectfully requests the Court to grant the Debtor(s) a Hearing and upon such Hearing, Deny the Trustee's Motion to Dismiss and award Debtor(s) all further relief to which debtor(s) may justly be entitled.

Respectfully submitted,  
***The Law Offices of Joel Gonzalez, PLLC***

**/s/ Joel Gonzalez**

Joel Gonzalez, Attorney for the Debtor  
SBOT 24053233, Fed I.D. #632677  
5350 S. Staples, Ste. 406  
Corpus Christi, Texas 78411  
Telephone No. 361-887-6363  
Facsimile No. 361-654-3622

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of May, 2016, a true and correct copy of this Debtor's Response to the ***Trustee's Motion to Dismiss*** was served via First Class Mail and/or via electronic mail to all the parties listed below.

**Chapter 13 Trustee**

Cindy Boudloche - Trustee  
555 N. Carancahua, Ste. 600  
Corpus Christi, Texas 78475

**U.S. Trustee**

515 Rusk, Ste. 3516  
Houston, Texas 77002

**Debtor(s)**

Hurtado, Humberto  
Hurtado, Jessica Lupita  
5538 Bowie Street  
Corpus Christi, Texas 78415

**/s/ Joel Gonzalez**

Joel Gonzalez, *Attorney for the Debtor*